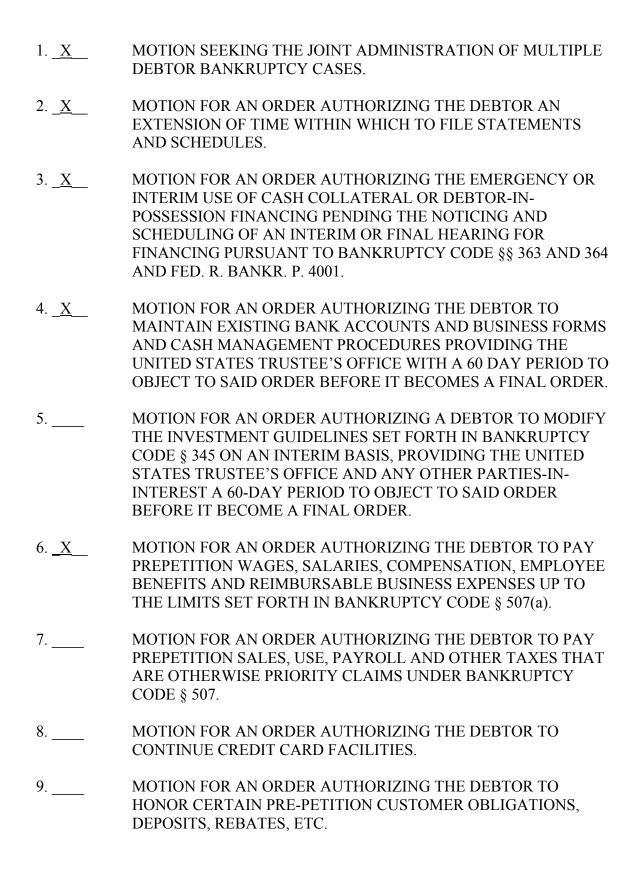
UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-2(c) Smith Giacometti, LLC Harry J. Giacometti, Esquire (HG2368) 76 Euclid Avenue, Suite 202 Haddonfield, NJ 08033 (856) 428-1191 Counsel For The Debtors IN RE: CHAPTER 11 CASE NO. 10-13006 GMB PAGANINI FOODS, LLC, Debtor. IN RE: CHAPTER 11 CASE NO. 10-13007 GMB BV WAREHOUSING, LLC, Hon. Gloria M. Burns Debtor. **Hearing Date:** 

## APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

Paganini Foods, LLC and BV Warehousing, LLC (the "Debtors"), by and through their proposed counsel, Smith Giacometti, LLC, hereby apply for an Order expediting consideration of their first day motions, and in support hereof, state as follows:

- On February 1, 2010, the Debtors filed petitions for relief under Chapter
  of the Bankruptcy Code.
- 2. Counsel for the Debtors requests that the following relief be provided on a first day basis (check those that apply):



10	MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO
	CONTINUE WITH AND PAY PRE-PETITION OUTSTANDING
	AMOUNTS DUE ON VARIOUS INSURANCE POLICIES.
11. <u>X</u>	MOTION FOR AN ORDER AUTHORIZING PAYMENT OF
	OUTSTANDING AND UNPAID PRE-PETITION DEBT TO CERTAIN
	VENDORS WHO PROVIDE CRITICAL AND NECESSARY
	SERVICES AND/OR PRODUCTS TO THE DEBTOR.
12	MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY CODE §
	366 REGARDING ADEQUATE ASSURANCE FOR THE FUTURE
	PERFORMANCE FOR UTILITIES AND ESTABLISHING
	PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL
	ADEQUATE ASSURANCE.
13	MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO
	RETAIN A CLAIMS AND NOTICING AGENT.
14	MOTION FOR AN ORDER ESTABLISHING NOTICING
	PROCEDURES.
15	OTHERS [COUNSEL SHOULD ADD ALL OTHER MOTIONS
13	FOR WHICH IT SEEKS CONSIDERATION AS A FIRST DAY
	MATTER.]
	SMITH GIACOMETTI, LLC

Date: February 2, 2010

By:

Harry J. Giacometti, Esquire 76 Euclid Avenue, Suite 202 Haddonfield, NJ 08033 Tel: (856) 428-1191

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Proposed counsel to the Debtors